

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

AMAZON.COM, INC., a Delaware corporation; AMAZON.COM SERVICES LLC, a Delaware limited liability company; and AMAZON TECHNOLOGIES, INC., a Nevada Corporation,

Plaintiffs,

v.

DIGITAL HOME SOLUTIONS LLC, a Georgia corporation; JOTI APPEE DHILLON, an individual; and DOES 1-50, unknown individuals and entities,

Defendants.

Civil Action File

No.: 1:23-cv-5175-ELR

**PLAINTIFFS' RESPONSE TO ORDER TO SHOW CAUSE  
AND NOTIFICATION OF SETTLEMENT**

Pursuant to the Court's March 5, 2024 Order, Doc. 20, Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies, Inc. (collectively, "Plaintiffs") hereby respond and notify the Court:

1. Plaintiffs and Defendants have been in settlement negotiations since the initiation of this case and have attempted to limit the expense and potential disputes that could arise out of court filings, in order to see if the parties could reach resolution;

2. Plaintiffs pushed forward settlement negotiations throughout this period. The parties' joint requests for extensions were good faith efforts to further settlement negotiations, limit the expense to the parties, and enhance judicial efficiency. *See* Dkts. 14, 17, and 19;

3. Plaintiffs and Defendants signed a settlement agreement on March 11, 2024, that includes a monetary payment, a potential Stipulated Judgment if a payment is not made, and the joint request for the entry of a Permanent Injunction by this Court; and

4. Plaintiffs respectfully request the Court provide the parties ten calendar days, until March 22, 2024, to file agreed-upon orders and a joint motion for dismissal.

Accordingly, Plaintiffs show cause that their claims against Defendants should not be dismissed for failure to prosecute because Plaintiffs and Defendants were able to complete a settlement agreement, and the parties plan to file the agreed-upon orders and the joint motion for dismissal required by the settlement agreement within ten days.

Respectfully submitted this 12<sup>th</sup> day of March, 2024.

ROBBINS ALLOY BELINFANTE LITTLEFIELD LLC

/s/ Craig G. Kunkes

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**L.R. 7.1(D) CERTIFICATION**

I certify that this Motion has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Motion has been prepared using 14-pt Times New Roman Font.

/s/ Craig G. Kunkes

Craig G. Kunkes

Georgia Bar No. 963594

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, I electronically filed the foregoing **PLAINTIFFS' RESPONSE TO ORDER TO SHOW CAUSE AND NOTIFICATION OF SETTLEMENT** with the Clerk of Court using the CM/ECF system, which will send e-mail notification of such filing to counsel of record.

This 12<sup>th</sup> day of March, 2024.

/s/ Craig G. Kunkes  
Craig G. Kunkes